

**UNITED STATES BANKRUPTCY COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA**

**In Re:** : **Chapter 13**  
: **Kathleen A. Earley** : **Bankruptcy No. 17-14140-jkf**  
: **Debtor.** : **Hearing Date & Time: 6/26/19 at 9:30 a.m.**

**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

U.S. Bank Trust National Association, as Trustee of the Tiki Series III Trust has filed a Motion for Relief from Stay with the Court in order to gain Court authority to foreclose on real property known as 1670 East Strasburg Road, West Chester, PA 19380.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before N/A (17 days after the date the notice was mailed) you or your attorney must do all of the following:

(a) file an answer explaining your position at

Clerk of Courts  
United States Bankruptcy Court  
Robert N.C. Nix, Sr. Federal Courthouse  
900 Market Street, Suite 400  
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:

Jillian Nolan Snider, Esquire  
Tucker Arensberg, P.C.  
1500 One PPG Place  
Pittsburgh, PA. 15222  
(412) 566-1212  
(412) 594-5619 (fax no.)

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Jean K. FitzSimon on June 26, 2019, at 9:30 a.m. in Courtroom # 3 in the Robert N.C. Nix Sr. Federal Courthouse, 900 Market Street, Suite 203, Philadelphia, PA 19107.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Date: 6/3/19

TADMS:5074754-1

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**CERTIFICATE OF SERVICE**

I, Jillian Nolan Snider, of Tucker Arensberg, P.C., 1500 One PPG Place, Pittsburgh, Pennsylvania 15222, certify that I am, and at all time hereinafter mentioned, more than 18 years of age.

That on the 3<sup>rd</sup> day of June, 2019, I served a copy of the Notice of the Motion for Relief from Automatic Stay filed in this proceeding by first class mail, postage pre-paid, or ECF notice as follows:

**Debtor via first class mail**

Kathleen A. Earley  
1670 E. Strasburg Road  
PO Box 5290  
West Chester, PA 19380

**Via ECF Notification**

Stephen Vincent Bottiglieri, Esq. 66 Euclid Street Suite C Woodbury, NJ 08096	William C. Miller, Esq. 2901 St. Lawrence Avenue Suite 100 Reading, PA 19606	Office of the U.S. Trustee 833 Chestnut Street Suite 500 Philadelphia, PA 19107
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Executed: 6/3/19

/s/ Jillian Nolan Snider  
Jillian Nolan Snider, Esquire, Pa. I.D. # 202253  
1500 One PPG Place  
Pittsburgh, PA 15222  
(412) 566-1212  
Attorney for U.S. Bank Trust National Association